

Hearing Date: November 13, 2017 at 1:30 p.m. (Atlantic Standard Time)

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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In re: :
THE FINANCIAL OVERSIGHT AND : PROMESA
MANAGEMENT BOARD FOR PUERTO RICO, : Title III
as representative of : Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO, *et al.*, : (Jointly Administered)
Debtors.¹ :
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In re: :
THE FINANCIAL OVERSIGHT AND MANAGEMENT : Adv. Proc. No. 17-BK-4780-LTS
BOARD FOR PUERTO RICO, :
as representative of :
PUERTO RICO ELECTRIC POWER AUTHORITY, : **Court Filing Relates Only to**
Debtor. : **PREPA and Shall Only be Filed**
: **in Case No. 17-BK-4780-LTS**
: **and Main Case 17-BK-3283-**
: **LTS**
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**NOTICE OF CONSENT OF PUERTO RICO ELECTRIC POWER AUTHORITY TO
CREDITORS' COMMITTEE'S BANKRUPTCY RULE 2004 MOTION**

¹ The Debtors in these title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747)

To the Honorable United States Magistrate Judge Judith G. Dein:

1. The Puerto Rico Electric Power Authority (“PREPA”) and the Puerto Rico Fiscal Agency and Financial Advisory Authority (“AAFAF”), as the entity authorized to act on behalf of PREPA pursuant to the authority granted to it under the *Enabling Act of the Fiscal Advisory Authority*, Act 2-2017,¹ hereby inform the Court that they consent to the relief sought in the *Urgent Motion of Official Committee of Unsecured Creditors for Order, Under 11 U.S.C. § 1103 and Bankruptcy Rule 2004, Authorizing Discovery With Respect to PREPA Engagement of Whitefish Energy Holdings, LLC and Urgent Request for Hearing* [Docket No. 364 in PREPA Docket] as it relates to the authority of the Official Committee of Unsecured Creditors (the “Committee”) to pursue discovery.

2. PREPA agrees that it will begin commencing production of materials one week from the date of this notice of consent. PREPA and the Committee agree that the initial phase of production will include all of the information being produced for the House Committee on Natural Resources.

3. Once the Committee has reviewed all of the information provided in the initial phase of production, the parties will meet and confer regarding further document productions and discovery pursuant to the Committee’s original document requests to PREPA or any further requests, if needed.

4. PREPA and the Committee agree that all objections related to all documents or discovery sought by the Committee subsequent to its review of the initial productions, save for objections related to the Committee’s authority to pursue such discovery, are hereby reserved.

¹ The Financial Oversight and Management Board for Puerto Rico (“FOMB”), as the Debtors’ representative pursuant to section 315(b) of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. §§ 2101-2241, has authorized AAFAF to file this Notice of Consent on behalf of PREPA.

5. If the Committee and PREPA are not able to resolve disputed issues with regard to scope, timing, or related matters, any party may seek Court intervention by requesting a telephonic hearing, with such hearing to be conducted in seven calendar days' notice subject to the Court's calendar.

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Dated: November 7, 2017
San Juan, Puerto Rico

Respectfully submitted,

/s/ Joseph P. Davis III, Esq. (by consent)

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